

1 Eliot A. Adelson (SBN 205284)
2 James Maxwell Cooper (SBN 284054)
KIRKLAND & ELLIS LLP
3 555 California Street, 27th Floor
San Francisco, CA 94104
Telephone: (415) 439-1400
4 Facsimile: (415) 439-1500
Email: eadelson@kirkland.com
5 Email: max.cooper@kirkland.com

6 James H. Mutchnik, P.C. (*pro hac vice*)
7 Kate Wheaton (*pro hac vice*)
KIRKLAND & ELLIS LLP
8 300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
9 Facsimile: (312) 862-2200
Email: jmutchnik@kirkland.com
10 Email: kate.wheaton@kirkland.com

11 Attorneys for Defendant
12 HITACHI DISPLAYS, LTD. (n/k/a JAPAN
DISPLAY INC.)

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

18 This Document Relates To:
19
20 *All Actions.*

DECLARATION OF TAKETERU
KAKESU IN SUPPORT OF HITACHI
DISPLAYS, LTD. (n/k/a JAPAN DISPLAY
INC.)'S MOTION FOR PARTIAL
SUMMARY JUDGMENT ON DUE
PROCESS GROUNDS

21
22
23
24
25
26
27
28 DECLARATION OF TAKETERU KAKESU IN SUPPORT
OF HITACHI DISPLAYS, LTD.' (N/K/A JAPAN DISPLAY
INC.)'S MOTION FOR PARTIAL SUMMARY JUDGMENT
ON DUE PROCESS GROUNDS

CASE No.: 3:07-cv-05944-SC
MDL No.: 1917

1 I, Taketeru Kakesu, hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action. I have personal
3 knowledge of the facts and matters stated herein and, if called, could and would testify competently
4 to them. Although English is not my native language, I fully understand the contents of this
5 Declaration.

6 2. I am currently employed by Japan Display Inc. ("JDI"), as Technical Specialist of the
7 Logistics & Foreign Trade Affairs Department. I am authorized to make this declaration on behalf
8 of Hitachi Displays, Inc. (n/k/a Japan Display Inc.) ("HDP"). I am informed and believe that the
9 matters stated in this declaration are true.

10 3. HDP was a Japanese corporation with its principal place of business at 3300, Hayano,
11 Mobera-shi, Chiba-ken, 297-8622, Japan.

12 4. HDP never manufactured or sold cathode ray tubes ("CRTs"). HDP did not sell or
13 manufacture CRT Products in the United States. HDP did not sell CRTs to consumers because
14 CRTs are not a standalone product.

15 5. Based on the information reasonably available to JDI today, between March 1, 1995
16 and November 25, 2007, the Relevant Period alleged by the plaintiffs in this case, HDP had no sales
17 of CRTs or CRT Products to customers located in Arizona, California, Florida, Illinois,
18 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico,
19 North Carolina, or Wisconsin (collectively, the "Relevant States").

20 6. HDP had no offices in the Relevant States during the Relevant Period. JDI has no
21 offices in Arizona, Florida, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada,
22 New York, New Mexico, North Carolina, or Wisconsin.

23 7. Based on the information reasonably available to JDI today, HDP did not own
24 property in the Relevant States, and HDP did not acquire or lease property in the Relevant States
25 during the Relevant Period. JDI does not own or lease property Arizona, Florida, Massachusetts,
26 Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico, North Carolina, or
27 Wisconsin.

8. Based on the information reasonably available to JDI today, no director of HDP resided in the Relevant States during the Relevant Period.

9. HDP did not file and was not required to file taxes in the Relevant States during the Relevant Period. JDI has not filed and has not been required to file taxes in Arizona, Florida, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico, North Carolina, or Wisconsin.

10. Neither JDI nor HDP has ever held any formal meetings of its directors or shareholders in the Relevant States.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6
day of November, 2014 in Chiba, Japan.

Takateru Kakesu